

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

IN RE GENWORTH FINANCIAL, INC.,  
SECURITIES LITIGATION

Civ. A. No. 3:14-cv-00682-JAG

Hon. John A. Gibney, Jr.

**CLASS ACTION**

**LEAD PLAINTIFFS' MEMORANDUM IN SUPPORT OF THEIR MOTION TO SEAL  
MEMORANDUM OF LAW AND EXHIBITS IN SUPPORT OF THEIR MOTION TO  
COMPEL PRODUCTION OF DOCUMENTS AND OPPOSING DEFENDANTS'  
REQUEST TO "CLAWBACK" NON-PRIVILEGED DOCUMENTS**

Lead Plaintiffs Fresno County Employees' Retirement Association and Her Majesty the Queen in Right of Alberta ("Lead Plaintiffs"), by and through their undersigned counsel of record, respectfully submit this Memorandum in support of their Motion To Seal Memorandum Of Law And Exhibits In Support Of Their Motion To Compel Production Of Documents And Opposing Defendants' Request To "Clawback" Non-Privileged Documents ("Motion to Seal").

The Parties to this action entered into a Stipulated Protective Order filed with this Court on June 25, 2015 (the "Protective Order") (ECF No. 85). Section 5.2 of the Protective Order requires a party to file under seal materials containing information designated by another party as Confidential Discovery Material (as defined in the Protective Order). Here, Defendants have made this designation as to the documents and information set forth in Lead Plaintiffs' Memorandum of Law and Exhibits supporting their Motion To Compel Production Of Documents And Opposing Defendants' Request To "Clawback" Non-Privileged Documents.

Under these circumstances, Section 5.2 of the Protective Order requires that these materials be filed under seal as an initial matter.

DATED: October 29, 2015

/s/ Susan R. Podolsky

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 29, 2015, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

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